



WWW.MKCLAWGROUP.COM
LAW OFFICES OF MICHAEL K. CHONG, LLC

NEW YORK:
1250 BROADWAY, 36TH FL. STE. 300
NEW YORK, NEW YORK 10001
(212) 726-1104
FAX (212) 726-3104

FORT LEE:
2 EXECUTIVE DRIVE, STE. 240
FORT LEE, NEW JERSEY 07024
(201) 947-5200
FAX (201) 708-6676

HOBOKEN:
300 HUDSON STREET, STE. 10
HOBOKEN, NEW JERSEY 07024
(201) 708-6675
FAX (201) 708-6676

MEMO ENDORSED

** Please Reply to: FORT LEE*

EMAIL:
BSHERR@MKCLAWGROUP.COM

January 4, 2023

Via ECF

Hon. Barbara C. Moses, United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse

Re: *Kaloshi et al v. West Village Oasis, Inc. et al.*, 22 CV 4593 (ALC) (BCM)

Your Honor:

This firm represents the plaintiffs in the above-referenced action. The plaintiffs hereby move to adjourn the pretrial conference scheduled for January 11, 20, 2022, and the time to file submissions prior to that conference for three weeks. There has been one such prior motion.

I was out of town December 13 through 16, and then I was asked on very short notice by the American Red Cross to provide supervisory and administrative support to the mass care component of a multiagency response to the suddenly escalated influx of immigrants in El Paso, Texas, where I have been since December 20 and have been asked to extend my time here to remain now through January 9.

This absence is resulting in some congestion in my work when I return, and I would like to take the time to make a thorough preparation with my clients and the defendants' counsel following the mediation and in advance of the conference.

I apologize to the Court for the delay and thank the Court for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brandon Sherr'.

Brandon Sherr

Plaintiffs do not disclose whether defendants consent to the adjournment. Defendants shall promptly advise the Court by letter whether they consent. SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Barbara Moses'.

Barbara Moses
United States Magistrate Judge
January 6, 2023